

ENCAMP

# Leading the Transition:

From *Reactive* to **Proactive** Environmental Compliance



# Meet Your Guides

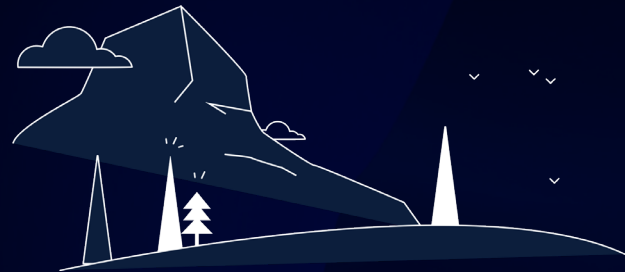


**Jennifer Collins**  
Technical Program Manager



**Adam Estes**  
Technical Program Manager

# About Encamp



Encamp helps EHS compliance managers and their teams bring together everything needed to understand, manage, and meet environmental compliance requirements.

We have created a unified data system for environmental information, to drive continual compliance.



# Environmental Compliance:

## What is it?

- **Legal Requirements**

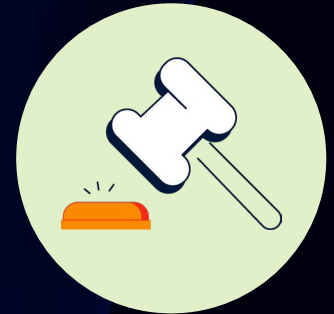
- CAA, CERCLA, CWA, EPCRA, FIFRA, RCRA, SDWA, TSCA

- **Public Expectation**

- ESG, Transparency or Violations

- **Consequences of Non-Compliance**

- Fines, Closure or Criminality and/or
- Public Perception



# Reactive Environmental Compliance

## **Managing at the “Floor” or maybe even less:**

Moving from fire to fire – one inspection, audit or fine to the next

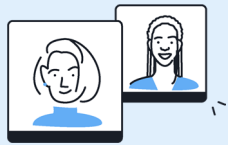
### **Case Studies:**

- Audit discovered incompatible wastes stored next to each other, missing/ incomplete labels, etc. but the weekly inspections showed everything complete.
- Facility tracked paint usage but had no notification procedure to warn when close to exceedance.
- Facility maintained list of products used but checked them against regulations after usage; resulted in Air Toxics exceedance

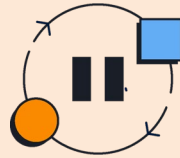
# Barriers to Proactive Transition



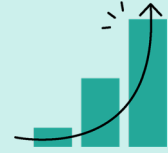
Resource  
Constraints



Lack of Expertise



Resistance to  
Change /  
Skepticism



Unrealistic  
Expectations



Lack of  
Persistence

# Proactive Environmental Compliance

## Why try?

- Risk Reduction
- Cost Savings
- Enhanced Reputation

## Examples:

- Engaged Workforce / Strategy Assessments
- Environmental Management Systems
- State Environmental Awards / Voluntary Programs



# A Proactive Approach – Back to Basics

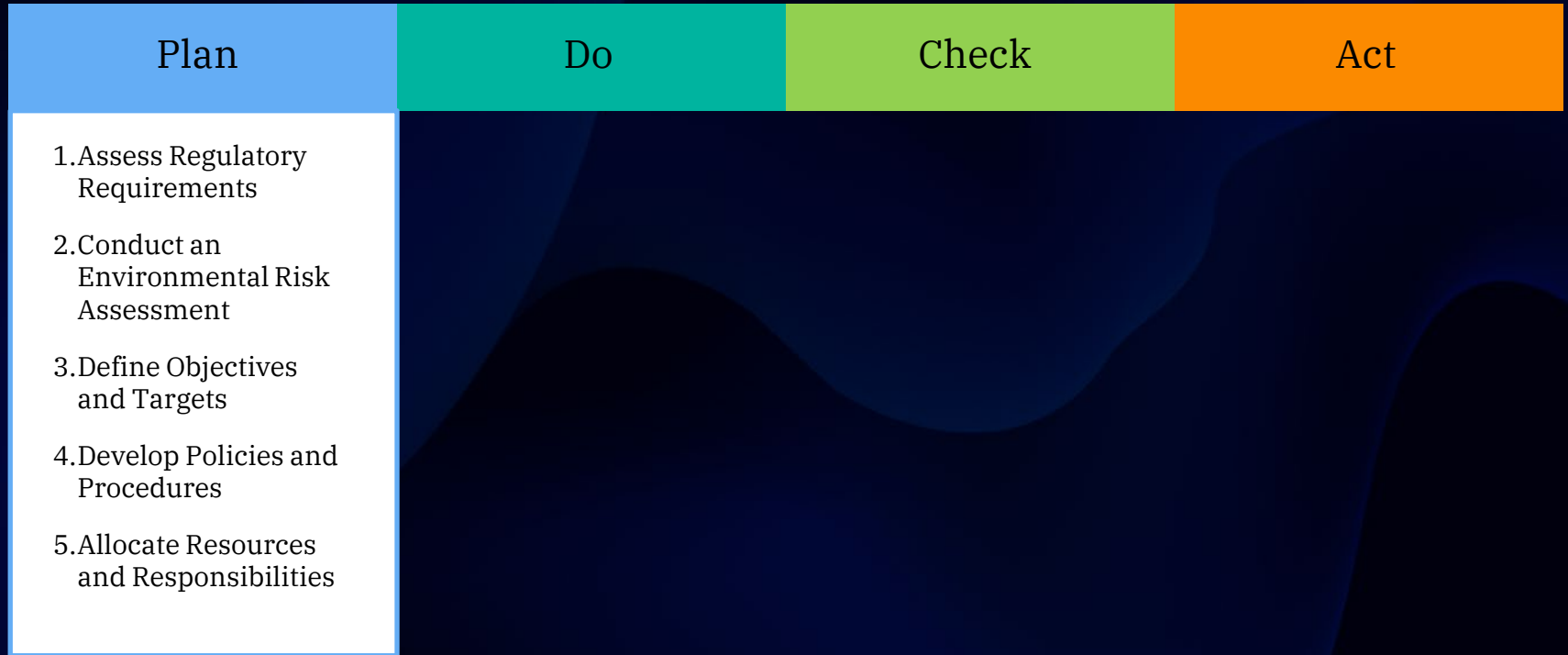
Plan

Do

Check

Act

# A Proactive Approach – Back to Basics



# A Proactive Approach – Back to Basics

Plan

Do

Check

Act

1. Train Employees
2. Implement Operational Controls
3. Ensure Proper Documentation
4. Engage Vendors and Contractors
5. Conduct Routine Operations

# A Proactive Approach – Back to Basics

Plan

Do

Check

Act

1. Conduct Regular Inspections and Audits
2. Monitor Key Performance Indicators (KPIs)
3. Review Incident Reports
4. Evaluate Compliance Trends
5. Obtain Feedback

# A Proactive Approach – Back to Basics

Plan

Do

Check

Act

1. Implement Corrective and Preventative Actions
2. Review and Update Policies
3. Improve Employee Training
4. Set New Goals
5. Communicate Results and Changes



**PRO TIP:**

## Harness the power of digital solutions

Digital solutions can make the capacity to plan, maintaining and track KPIs far more likely.

The Microsoft suite can work... but there are stronger options

# Examples / Case Studies

## Tales from the Trails...

- Facility had large amounts of air deviation reporting. Reviewed the alarms from past year and segregated into “types” – thereafter, began tracking each alarm and made a goal of 10% reduction year after year by “type.” Resulted in 90% reduction over time.
- SDS Review process identified contradictory statements on SDS; evaluated and supplier corrected to ensure correct / would not trigger reporting thresholds.
- An Engine manufacturer evaluated its process for applying a surface coating to the undercarriage of their engines, they were able to reduce their paint usage by half and achieved a significant reduction in Volatile Organic Compound Emissions.

# Compliance is challenging, but non-compliance is harmful and costly

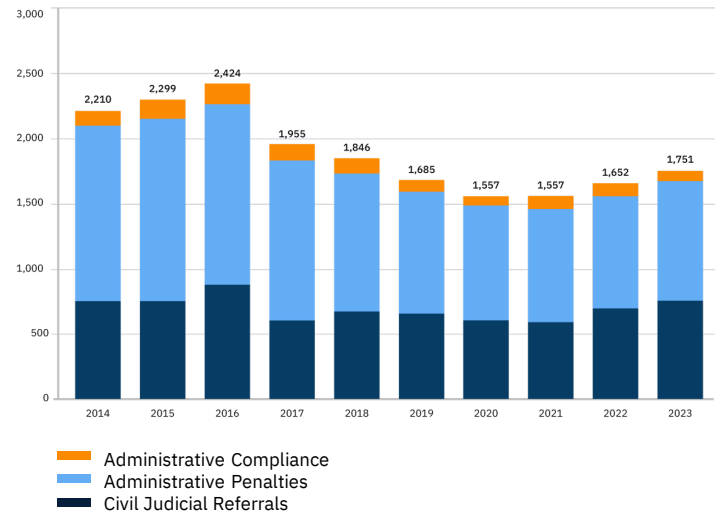
## From *The 2024 State of Environmental Compliance: Benchmarking Report*

- Manufacturing represents 33.4% of penalized facilities (across all statutes)

If you're in the Manufacturing sector, the complexity and breadth of your regulatory requirements are intensive.

Compare this to how most Enforcement Cases go...

Total Civil Enforcement Case Initiations  
FY 2014 - FY 2023



# Final Thoughts

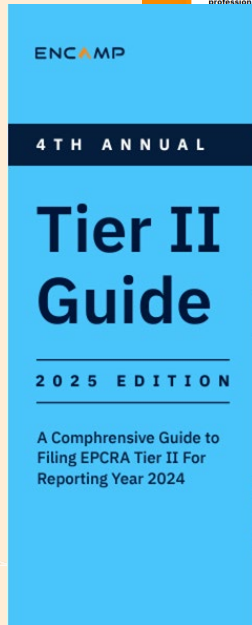
## Transition to Proactive Environmental Compliance

- Proactive > Reactive
- Barriers are numerous
- Success requires advance planning prior to execution
- Start small, verify maintenance, add
- Collaborate!

**"The best way to predict the future is to create it."**

— Peter Drucker, father of modern management

# Regulatory Guidance Materials



## Waste Data Management Simplified: The 5-Step Guide to Continuous Compliance

The Resource Conservation and Recovery Act (RCRA) sets the framework for proper management of hazardous waste by those that generate it, from cradle to grave, in the United States. Compliance with RCRA regulations is not just a legal obligation for generators; it's a critical step in protecting human health and the environment in which companies operate. Non-compliance can result in violations, penalties in the millions of dollars, reputational damage and environmental harm.

To ensure they're staying on the right side of the regulations, organizations need a systematic approach to waste data management. By implementing a continuous waste data management strategy that standardizes and centralizes waste data from across the business, teams can ensure they're meeting regulatory requirements while optimizing their waste handling processes.

This infographic provides five key steps and associated activities to help you get your arms around continuous waste data management, designed to keep your organization compliant and efficient.

### Understand



- Determine generator status via available data**
  - Understand your waste generation quantities and continuously assess your status
  - Accurately determine your status based on your operations and waste generation
  - Document your current status with internal and external parties
  - Verify status compliance with federal and state requirements



- Standardize waste data from vendors**
  - Collect your waste generation data from internal sources
  - Identify and gather data from external vendors such as haulers
  - Standardize data from all sites consistently across your organization
  - Ensure data is comparable between different sources

### Manage



- Review Your Manifests**
  - Stay up to date with e-Manifest requirements
  - Compare internal records to e-Manifest data
  - Identify any discrepancies between records
  - Promptly address inconsistencies



- Manage data on-site**
  - Implement proper waste storage practices
  - Correctly label waste so you know what you have on-site at all times
  - Maintain thorough waste documentation
  - Accurately record and regularly update on-site waste data
  - Conduct inspections regularly
  - Make data easily accessible to relevant parties

### Comply



- Report submissions and Payments**
  - Identify what wastes need to be reported in your state
  - Verify vendors used by the state and ensure data accuracy and completeness
  - Manage fee payments including invoices and mailers
  - Track upcoming reporting deadlines
  - Submit required reports on time

# Encamp is the largest 3rd party Tier II Filer in the US

**41K+**

REPORTS FILED  
SINCE 2019

**80K+**

PEOPLE HOURS  
SAVED

**200+**

CUSTOMERS

**21K+**

FACILITIES  
IMPLEMENTED



# Q&A